## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JANE STREET GROUP, LLC

Plaintiff and Counterclaim-Defendant,

Civil Action No. 1:24-cv-02783

v.

MILLENNIUM MANAGEMENT LLC, DOUGLAS SCHADEWALD, and DANIEL SPOTTISWOOD

Defendants and Counterclaim-Plaintiffs.

## DECLARATION OF BRIAN R. CAMPBELL IN SUPPORT OF DEFENDANTS AND COUNTERCLAIM-PLAINTIFFS' LETTER MOTION TO COMPEL DOCUMENT DISCOVERY

I, Brian R. Campbell, declare pursuant to 28 U.S.C. § 1746 as follows:

- 1. I am a senior attorney at the law firm of Elsberg Baker & Maruri, PLLC, counsel for Defendants and Counterclaim-Plaintiffs Douglas Schadewald and Daniel Spottiswood. I am a member in good standing of the Bar of the State of New York and admitted to practice in the Southern District of New York.
- 2. I respectfully submit this Declaration in Support of Defendants' Letter Motion to Compel Document Discovery. I am personally familiar with the facts included in this declaration.
- 3. Attached hereto as Exhibit 1 is a reference chart summarizing the document requests at issue in the Letter Motion to Compel Document Discovery.
- 4. Attached hereto as Exhibit 2 is a true and correct copy of a deficiency letter dated June 20, 2024, from Defendants' counsel to Plaintiff's counsel.

- 5. Attached hereto as Exhibit 3 is a true and correct copy of Jane Street's Responses and Objections to Defendants' First Set of Requests for Production.
- 6. Attached hereto as Exhibit 4 is a true and correct copy of an email dated July 3, 2024, from Brian Campbell to Jeffery Miller and others.
- 7. Attached hereto as Exhibit 5 is a true and correct copy of an email dated July 11, 2024, from Jeffery Miller to Brian Campbell and others.
- 8. Attached hereto as Exhibit 6 is a true and correct copy of a document produced in this action by Jane Street bearing Bates Numbers JS00000040-JS00000051.
- 9. Attached hereto as Exhibit 7 is a true and correct copy of a document produced in this action by Jane Street bearing Bates Numbers JS00000289-JS00000291.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Denver, Colorado on July 11, 2024.

/s/ Brian R. Campbell
Brian R. Campbell